

Subject: comments on Project


Resent-From: Islandereast.Comments@noaa.gov

Date: Wed, 19 Nov 2003 13:31:10 -0500

From: Loretta Fox <73420.1625@compuserve.com>

To: Department of Commerce <IslanderEast.comments@noaa.gov>

I am submitting additional comments on Islander East Project. I am unable to send some supporting the documents in this email but I am sending the total package via Fedex leaving CT today. It will contain documents #1 and #2 mentioned in my letter. Thank you, Loretta Fox

 <u>November 18.doc</u>	<p>Name: November 18.doc Type: WINWORD File (application/msword) Encoding: base64 Download Status: Not downloaded with message</p>
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November 18, 2003

The Office of the General Counsel for Ocean Services
National Oceanic and Atmospheric Administration
U.S. Department of Commerce
1305 East-West Highway
Silver Springs, MD 20910

Dear Members,

I had the opportunity to give testimony in New Haven last Wednesday. At that time I did not have sufficient time to elaborate on cumulative impacts of this Islander East Project. I am including a few more of my concerns as well as a couple of copies of #1 Sound Health, which I forgot to bring with me to the hearing. CT and NY have worked for a long time to clean up the Sound and are continuing that effort. This report is only one part of the many ways we are showing that we regard Long Island Sound as a treasure that has been abused and enough is enough.

Additional concerns regarding the cumulative impacts of the installation process:

If the *Horizontal Directional Drill (HDD)* fails to produce the avoidance of healthy shellfish beds presently farmed by Jonathan Waters, Islander East has not said what methods would then be employed. Based on the impact that an alternate method could have on these beds, I believe they should file the alternate methods they plan to use. If they propose blasting then that method would add another set of cumulative impacts, which are not in the equation at this time. HDDs are known to fail and I believe that in light of that history, Islander East should give full explanation of what technique(s) would then be employed before they begin the project and you should ask them to put it in writing for all to see.

Trenching to install the pipe

Sediment suspension.

Sediment plumes impact on the oxygen levels. *Dissolved oxygen* – Fine sediments in depositional plains often contain biological material that will oxidize upon contact with oxygen. Biological material trapped in fine sediment often consumes all the available oxygen, causing the sediment to become devoid of oxygen (anoxic). This condition is often found a few inches below the surface of areas with fine sediment. Once such material is dispersed in the water column it will react with the dissolved oxygen in the water and it is very possible that the surrounding environment will suffer temporary oxygen depletion. Such depletion even temporary constitutes serious threat to the marine environment.

Open trenches and holes in which lobsters could be trapped

Storms with heavy winds are quite common during the fall and winter months here in Long Island Sound. Such weather could send barges and tugs into safe harbor leaving open trenches in which Lobsters could be trapped as the move about the area that they inhabit.

Large anchor holes created by the spuds holding barges in place while the trenching operation is being completed could also act to trap lobsters.

Long Island Sound Lobstermen do not need another impact on their business. However, several local lobster/oyster/clam people have signed agreements to receive payment from Islander East. One of those “farmers” spoke at the hearing in support of the project. However, there are many more who did not get any money and their livelihood is at risk from the many cumulative impacts I have put forth.

Fin Fish Communities

Fin Fishermen are also in danger of losing one of the finest marine fishery areas in Long Island Sound (Brown’s Reef). If the salinity fluctuates during installation, which was included in installation information provided by Islander East, the area be dropped into the category of estuarine which is dangerous to the inhabitants. Brown’s Reef has historically been a great breeding area. The loss of this natural estuary could change the nature of fin fishing and further deplete an already struggling fish population. While commercial fishing is not done in this area, sports fishermen come from all over to enjoy the bounty of this God given breeding ground. Winter Flounder are known to inhabit this area and their egg-laying season is January through June – just when Islander East says they will be doing installation in this area.

I am including example #2, which is a comparison of fish populations in the Norwalk Harbor area of the Sound. This data was collected by the DEP and it shows results of count history and where the fish population in the Sound had been and is at the present time. This shows sadly the dwindling populations in most cases for natural occurring finfish and increase in populations of Northern Sea Robins that are not a sign of a healthy environment.

Summary:

I believe that the in-water installation plans submitted by Islander East have a cumulative impact issues of 1) Water Quality and 2) Benthic Habitat with both short-term as Islander East admits to but also long-term impacts which are yet to be determined. Impacts will come from but not limited to:

- 1) Turbidity
- 2) Dissolved Oxygen
- 3) PH
- 4) Sea Bottom Alterations
- 5) Lowering of Thresholds of Impacts During Construction (blasting)

I do not believe that the need for gas supplied by this installation cannot be met by other services. Namely the alternate cooperation with Iroquois Gas and the Millennium Pipeline that is proposed and before your department. Other projects have also been mentioned as a means to provide for the need. As well, KeySpan would like to say that this is an alternate supply which full fills the need for competition for pricing of natural gas on Long Island. However, since KeySpan has controlling interest in Islander East and partial investment in the Iroquois pipeline projects – it would seem the control is in-fact in the hands of KeySpan and therefore no competition will exist.

KeySpan has spent the last year building a client base with offers of free items to consume more electricity and used fear tactics that homeowners with oil would have no heat to gain more of the market share. They have in recent time made a huge announcement that they had hired a new ad agency firm to increase their outreach to the Long Island community as well as the Boston Market. Even though they did not have the supply infrastructure (pipeline & generating facilities) in place. They have tried to build their market to justify projects in which they have a huge vested interest. Conservation was not the focus of this new advertising. The justification for this Islander East Pipeline is supposed to be on need. Is reality - true need or an artificial need created by the work of KeySpan and Duke Energy?

The process should not fall to the “ends justify the means” when in this case the “means” requires damage to our natural and precious resources.

Deny this application to overrule our Department of Environmental Protection who is charged to implement the Federal Coastal Zone Management Act to its highest degree. Your Department should be giving them an award for their long hard work to protect the CT environment for all citizens of the United States.

Sincerely,

Loretta Fox
15 Long Point Road
Stony Creek, CT 06405-5710
203-488-8873

#1 & #2 are being sent in hard copy along with this letter via FEDEX today. I am only able to send the letter via email.

Subject: Stop the Pipeline

Resent-From: Islandereast.Comments@noaa.gov

Date: Wed, 19 Nov 2003 13:12:37 -0800 (PST)

From: Jo-Ann Messina <pvrr42@prodigy.net>

To: IslanderEast.comments@noaa.gov

I am opposed to the Islander East Pipeline project because of the fact that no extensive reports have been completed about the environment, safety and economic issues prior to the company building it, nor did the company investigate the problems it would confront digging the cable to the proper depth prior to that action (irresponsibility). I live 2 blocks from New Haven harbor. The homeowners insurance I must pay reflects studies performed on future environmental, safety and economic issues along Connecticut's coast. I am directly effected by anything done in coastal regions along with any other living thing. I urge you to uphold the Oct 2002 and July 2003 decisions by the CT Department of Environmental Protection which denied Islander East a "coastal consistency" determination under CT's federally-approved Coastal Zone Management Program. PLEASE SUPPORT OUR CT DEP AND DENY ISLANDER EAST'S APPEAL. THANK YOU.

Jo-Ann Messina
85 Concord Street
New Haven, CT 06512

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Subject: Comment on Islander East Pipeline Company's Administrative Appeal

Resent-From: Islandereast.Comments@noaa.gov

Date: Wed, 19 Nov 2003 18:42:58 -0500

From: The Intrepid Traveler <admin@intrepidtraveler.com>

To: IslanderEast.comments@noaa.gov

Dear Sirs and Madames

I urge the National Oceanic and Atmospheric Administration to reject Islander East Pipeline Company's administrative appeal of the rejection of its application for a permit to lay a natural gas pipeline through our community and across Long Island Sound to Long Island. My neighbors and I oppose it for many reasons, including the environmental damage it will definitely cause, the economic damage it will likely cause, safety concerns, aesthetic concerns, and the possible liability the local communities will be forced to assume. And all for a project that is unnecessary and appears to be based on a grab for potential future profits rather than a real need. More specifically, we oppose the project because of:

- * The almost certain destruction of wetlands and shellfish beds that will result. The wetlands are important to our environment; the shellfish beds to our economy. While Islander East claims its drilling method will minimize damage and ensure a quick recovery of the shellfish beds, which are important to our local economy, it also admits the method is untested & it plans to dredge if it doesn't work. Milford's beds still haven't recovered from the pipeline laid years ago, and there's no reason to believe that ours will escape the same fate.

- * The destruction of the marine environment of the Sound and consequent damage to fish stocks and the shoreline communities' recreational amenities and multi-million dollar travel and tourism industry in both Connecticut and Long Island.

- * Studies indicating that North Branford's water supply will be threatened by any drilling through its aquifer.

- * The damage it will inflict on Branford's Land Trust lands (including wetlands), the wildlife that populates them, and the walking trails through them. The Trust lands and wildlife are important to our community and our way of life. They also help to protect the environment. The lands were donated to the Trust to be held in perpetuity for the benefit of the community--not to be destroyed for the benefit of corporations and their shareholders.

- * Safety concerns. Pipeline explosions occur with enough regularity to suggest that running a pipeline alongside an active railroad line and close to residences and a school is asking for trouble.

- * Liability concerns. Islander East is a limited liability company. It has not given any assurances of its acceptance of ongoing responsibility for the pipeline it seeks to build. The town of Branford and the other communities through which the pipeline would run will be left holding the bag in the case of leaks, fires, or explosions.

- * FERC itself has said that there is an environmentally preferable alternative. Our understanding of the statutes is that permits can only be issued to projects that pose the least impact on the environment.

- * The legislature of the State of Connecticut has a moratorium on

cross-Sound projects to enable planning for a coordinated approach that will minimize damage to the environment. A coordinated approach makes sense, in terms of energy supply, environmental impact and economic impact. The moratorium should be respected.

* The applicants claim there is a pressing need to supply more natural gas to Long Island. But Duke Energy, Islander East's parent, has the right to pump gas to Long Island through a pipe from New Jersey. It hasn't used it because it says there is not enough demand to warrant it. If there's not enough demand, then obviously there is no need for the pipeline for which they are seeking this permit. It's just a "land grab" at Connecticut's expense and the expense of future generations, which will inherit the damaged lands and unsafe water.

* Ironically, maybe no one will benefit. If an email read at the August 5 hearing held by the Army Corps of Engineers is accurate, there may not be enough gas in the Sable Island area to supply Long Island or any of the rest of the Northeastern US. I have no idea if the figures stated in the email are accurate. But they should be thoroughly investigated before any permits are issued.

For all of these reasons, I urge you to reject the applicant's appeal

Sally Scanlon Monaghan
371 Walden Green Road
Branford, CT 06405

Subject: Support our CT. DEP. and deny Islander East's appeal.

Resent-From: Islandereast.Comments@noaa.gov

Date: Wed, 19 Nov 2003 19:12:11 -0500

From: "w.lazine" <w.lazine@comcast.net>

To: <islandereast.comments@noaa.gov>

CC: <islandereast.comments@noaa.gov>

Mr. Secretary,

I have been in opposition to this pipeline and over the course of more than two and a half years I have requested permission to intervene on the proposed pipeline with the Federal Energy Regulatory Commission and the Connecticut Siting Council. Listed herein are conditions of concern I had originally sent on July 19 2001.

As an affected property/landowner. within 50 feet of proposed pipeline.

Concern for septic system and well on this property (blasting)

Potential harmful effect to endangered species both plant and animal in this area (Branford)

A map clearly indicating the project is within many locations that may have potential conflict with a species or natural community. This is on land and in Long Island Sound off Branford shores. Information is based on data collected by CT Geological & Natural History Survey, other units of D.E.P., private conservation groups and the scientific community and compiled by the Natural Diversity Data Base .

The proposed pipeline in Long Island Sound would transverse Branford's approved recreational shellfish harvesting areas and also in or adjacent to commercial fishing areas.

This whole area is mainly comprised of pink granite that would require extensive blasting.

The effect from blasting/construction to wells and possible contamination to water. This area has a very high water table.

Sanitation issues, homes along the southern portion of the proposed route do not have access to city sewer lines. Many of the homes in this area are close to inland wetlands that are linked to tidal wetlands. This is compounded by the extent of pink granite throughout the area. (Possible sewage contamination from blasting to these waterways).

The proposed pipeline would cross Route 146 a registered scenic state highway.

A 24 inch gas pipeline with operating pressure of 814 pounds per square inch within close proximity of Wightwood School?

Adverse ecological effect to Branford, a registered coastal town, including woodland, marshland and tidal wetland.

Permanent visual disruption of natural growth and topography in this area.

The 75 foot construction right of way and a 50 foot permanent right of way.

The threat of eminent domain proceedings.

The simple fact that this does not hold any benefit to anyone in this area.

Taking land from a land trust, destroying the basic reason for having a land trust.

Most important is that all this damage is absolutely not necessary. There is another proposed project by Iroquois Gas Transmission System to service the same market that uses a pipeline that is already built with respect to Connecticut soil. No further damage would result to Connecticut would result from this alternative project.

Over two years have elapsed during which time I have listened to expert testimony confirming the above. Although much of

the above will not have any bearing on the outcome of the appeal because it is on a personal level and at least seems at this point in time to have progressed to Connecticut's Department of Environmental Protection exorcizing their right to deny the required certification under the CZMP, hence the appeal.

In an effort to focus comments on topics that are relevant to issues the Secretary considers in deciding Islander East's appeal such as the project being "necessary in the interest of national security" :

There was never any mention by Islander East in any of the initial correspondence that was sent indicating this pipeline was "necessary in the interest of national security" but instead for Public Convenience and Necessity. The first time I heard any say in regard to security issues was by a speaker concerned with the possibility of this pipeline being the potential target for terrorist attack. At best the response by Islander East was having more pipelines would be better, or something of that nature. This of course was brought up after the attack on 911. Our fighter jets do not use natural gas nor do nuclear aircraft carrier's.

I hope this is not just another loop hole or the potential to become a loop hole down the road for Duke Energy or Keyspan corporation just to establish a piece of the market from New York.

Most important is the impact or devastation this pipeline will have in this area to the environment. I have fished in Long Island Sound many years and have been able to scuba dive many areas from Milford to Branford. The dives included many of the Thimble Islands off Branford's shores. I have been a certified diver for many years as well as my brothers and both my parents. Given what I have been able to see underwater and what I have learned about (both good and bad), I'm sure it will come as no surprise to you my overwhelming opposition to this pipeline or any pipeline that crosses Long Island Sound or anything else crossing the Sound. There are records confirming the

adverse effect from this type of construction activity from the pipeline in Milford CT. I hear foolish talk about getting fish, shellfish, lobster(etc) to re-establish after their habitat has been destroyed or the various marine life killed. This does not happen to often. What has been killed in the process will never reproduce. What is dead, is dead, you do not get it back. There is no confusion. The problems compound by contamination during construction, release of existing contaminants in Long Island and the introduction of contaminants via the pipeline course itself. This pipeline is crossing a known contaminated area in North Branford prior to crossing several tributaries that are not to far from Long Island Sound.

Long Island Sound has been treated like the cesspool of the east coast for far to long. It has been a dumping grounds for garbage, chemicals, runoff from storm drains and untreated sewage. Now every energy company wants to plow through, for a quick buck or a piece of the market even if there are alternatives that cause little or no damage to the environment. The existing gas suppliers of gas to New York do not indicate there has been a problem meeting the supply in the past, are not having a problem now and do not foresee one in the future.

It is my observation that we would never allow outsiders to attack our country, its people or our resources but we allow our own big companies to create havoc with the very same land and water we sustain life from. This all can be done with L.L.C. following your name. With the magnitude of this operation, in the vicinity of a railroad, destruction to the environment etc., etc., etc., and only have limited liability, you have to just love this country.

Help us to protect and preserve this unique area in Branford including the Thimble Islands, the marine life, fisherman both professional and recreational, public open space including land trust preserves. Preserve Long Island Sound by supporting our CT. Department of Environmental Protection and deny Islander East's appeal.

Please do not allow any further assaults by these terrorists on our precious recourses. They can not be regained.

In lieu of what has just transpired with the energy bill in congress hope that down the road you will be able to support all in opposition to this pipeline.

Thank You,
William G Lazine

Subject: Please support our CT. DEP and deny Islander East appeal.

Resent-From: Islandereast.Comments@noaa.gov

Date: Wed, 19 Nov 2003 21:38:42 -0500

From: "w.lazine" <w.lazine@comcast.net>

To: <islandereast.comments@noaa.gov>

CC: <islandereast.comments@noaa.gov>

Mr. Secretary,

My name is LOUIS NARGI at 79 stony creek rd Branford ct. I am using BILL LAZINE'S computer because mine is down.

I care about Connecticut's environment and Islander Sound. The current route of the Islander East Pipeline will do long term environmental damage to Long island Sound's water quality, shellfish beds and coastal wetlands. Since there is a less environmentally damaging feasible route alternative, please DO NOT ALLOW ISLANDER EAST TO USE THEIR CURRENT PREFERRED ROUTE.

I WHOLEHEARTEDLY SUPPORT THE DECISION OF THE CT DEP TO DENY ISLANDER EAST ACOASTAL CONSISTENCY DETERMINATION. PLEASE DENY ISLANDER EAST'S APPEAL

LOUIS NARGI
79 STONY CREEK RD
BRANFORD CT. 06405